



## ENZYMATIC THERAPY INCORPORATED

*What **Better** feels like.™*

**INTEGRATIVE THERAPEUTICS INC.™**  
NF Formulas • PhytoPharmica  
Tyler Encapsulations • Vitaline Formulas

9755 SW Commerce Circle, Suite B2  
Wilsonville, OR 97070  
P: 503.582.8386 • F: 503.582.0467

**ENZYMATIC THERAPY®  
&  
PHYTOPHARMICA®**

825 Challenger Drive, Green Bay, WI 54311-8328  
P: 920.469.1313 • F: 888.570.6460 (Enzymatic)  
P: 920.469.9099 • F: 920.469.4418 (Phyto)

October 22, 2004

Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 810  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

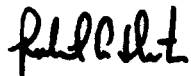
PRODUCT NAME	STATEMENTS
Nutrizyme™ with Iron	<p>Exclusive multivitamin and mineral supplement with highly concentrated, synergistic Plant Enzymes for optimal nutritional maintenance.*</p> <p>Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids, Palmitate), Vitamin C (from Poly-Ascorbate™), Vitamin D (as Cholecalciferol), Vitamin E (as d-Alpha-Tocopheryl Succinate), Vitamin K (as Phytonadione), Thiamine (as Thiamin HCl), Riboflavin (as Riboflavin 12.6 mg, Riboflavin-5'-Phosphate 5.1 mg), Niacin (as Niacinol™), Vitamin B6 (as Pyridoxine HCl 37.5 mg, Pyridoxal-5'-Phosphate 5.1 mg), Folic Acid, Vitamin B12 (as Cyanocobalamin), Biotin, Pantothenic Acid (as Calcium Pantothenate), Calcium (as Calcium Citrate, Malate, Ascorbate), Magnesium (as Magnesium Citrate, Ascorbate), Zinc (as Zinc Picolinate, Ascorbate), Selenium (as a Seleniium Aspartate Complex), Copper (as Copper Aspartate), Manganese (as Manganese Aspartate), Manganese (as Manganese Aspartate), Chromium (from GlucoChrome™), Molybdenum (as Molybdenum Aspartate), Potassium (as Potassium Citrate, Ascorbate), Plant Enzymes – Protease I, II, IV, Amylase, Cellulase I, Lipase II, Lactase II, Sucrase (Invertase), Maltase (Malt Diastase), Bioflavonoids, Inositol, Choline (as Choline Bitartrate), Gamma-Oryzanol (from Rice Bran Oil), Rutin, Pro-Flora™, L-Glutathioine, Reduced, Boron (as Boron Aspartate, Citrate), Vanadium (as Vanadium Aspartate)</p>

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I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

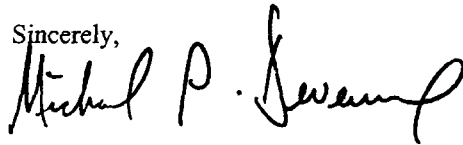
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date 10/22/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,



Michael P. Devereux  
Chief Financial Officer



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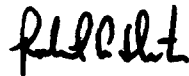
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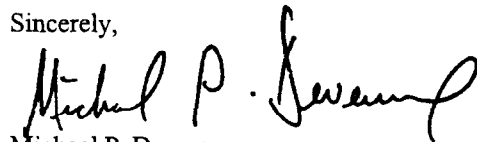
Robert C. Doster

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